1 2 3 4 5 6 7 8	JASON D. RUSSELL (SBN 169219) jason.russell@skadden.com ADAM K. LLOYD (SBN 307949) adam.lloyd@skadden.com KHALED B. ABBAS (SBN 335086) khaled.abbas@skadden.com SKADDEN, ARPS, SLATE, MEAGHI 2000 Avenue of the Stars, Suite 200N Los Angeles, California 90067 Telephone: (213) 687-5000 Facsimile: (213) 687-5600  Attorneys for Specially Appearing Mov. SHEIKH HAMAD BIN JASSIM BIN JABER BIN MOHAMMED BIN THA AL THANI	ant
9	UNITED STATES DISTRICT COURT	
10	CENTRAL DISTRICT OF CALIFORNIA	
11	IN RE APPLICATION OF	) CASE NO.: 2:24-mc-00062-JFW-PD
12	PATRICK MCKILLEN AND HUME STREET	DECLARATION OF KHALED B.
13	MANAGEMENT   CONSULTANTS LIMITED FOR	ABBAS IN SUPPORT OF MOTION TO QUASH SUBPOENAS ISSUED
14	AN ORDER PURSUANT TO 28 U.S.C. § 1782,	() UNDER 28 U.S.C. § 1782.
15	Applicants.	) <u>DISCOVERY MATTER</u>
16 17		Magistrate Judge: Patricia Donahue Courtroom: 580
18		Hearing Date: January 31, 2025 Hearing Time: 1:30 p.m.
19 20		Discovery Cutoff: Not applicable Pre-trial Conference: Not applicable Trial Date: Not applicable
21		1 That Date. Not applicable
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#### **DECLARATION OF KHALED B. ABBAS**

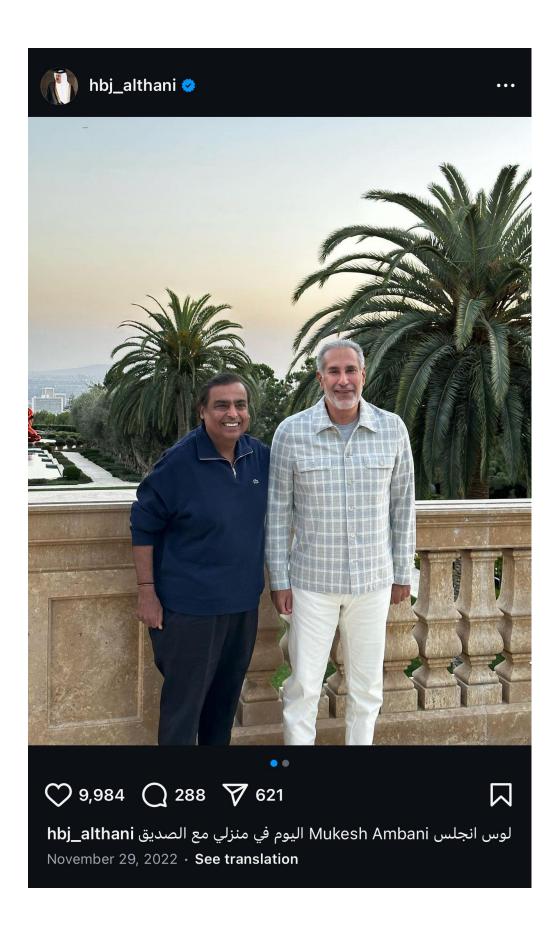
- 1. I am over the age of 18 and not a party to this action. I am an attorney admitted to practice before the courts of the State of California and have been admitted to this Court. I am an attorney at the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, which is counsel of record for Specially Appearing Movant Sheikh Hamad bin Jassim bin Jaber bin Mohammed bin Thani al Thani ("HBJ") in the above-captioned matter. I submit this declaration in support of HBJ's Motion to Quash Subpoenas Issued Under 28 U.S.C. § 8 | 1782 (the "Motion"). I make this declaration based on my own personal knowledge, and if called upon to do so, could and would testify competently thereto.
  - I am a native Arabic speaker and am fluent in Arabic and English. I can read and write Arabic and English. In addition to being a native Arabic speaker, I received formal instruction in Arabic and English through elementary, middle and high school.
- 3. Attached hereto as **Exhibit 1** is a true and correct copy of a November 29, 14 \| 2022, social media post that HBJ made on the Instagram platform in Arabic, as well as the 15 machine-translated English version that was created by Instagram's built-in translation 16 feature. I reviewed this social media post in Arabic and the machine-translated English 17 | version. I understand that Applicants Hume Street Management Consultants Limited and 18 Patrick McKillen have relied upon this social media post to assert that HBJ lives in Los Angeles.
  - 4. Instagram's built-in translation feature translated the Arabic text to "Today at my home with friend Mukesh Ambani Los Angeles."
  - 5. While the English translation uses the word "home," the Arabic word used by HBJ that it is translating—for which the English transliteration is "manzil"—does not necessarily mean "home" in the same sense it is normally used in the English language to signify one's primary place of residence. Rather, "manzil" can be used to generally refer to a house, inn, or any place of dwelling without signifying that the location is the speaker's primary place of residence.

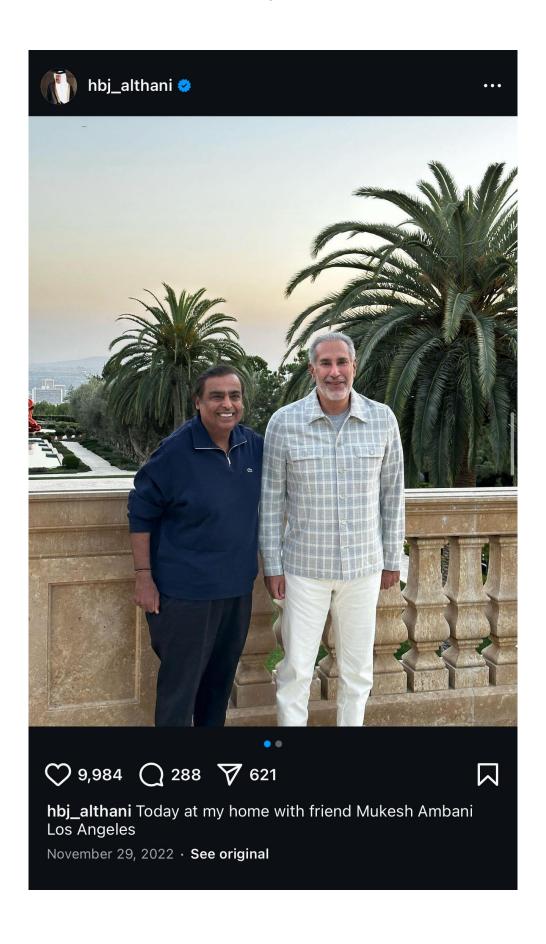
- 1 6. The Oxford Essential Arabic Dictionary confirms that the word "manzil" can refer to a house or place of dwelling, as opposed to "home." Attached hereto as **Exhibit 2**3 is a true and correct copy of an excerpt of the Oxford Essential Arabic Dictionary, which provides that the word "manzil" is the correct Arabic translation for the English word "house."
- 7. Further, HBJ has used the same word "manzil" to describe many different properties around the world, which is additional support that HBJ is using the word to simply describe the location as a house where he was currently located at the time the photograph was taken, as opposed to his primary personal residence. Attached hereto as **Exhibits 3** and **4** are true and correct copies of HBJ's public Instagram posts made in Arabic on May 2024 and October 2023, respectively, accompanied by the machine-translated English version of those same posts. I accessed these public social media posts from the Instagram platform.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on November 14, 2024, in Los Angeles, California.

By: Khaled B. Abbas





# Oxford Essential Arabic Dictionary

ENGLISH-ARABIC ARABIC-ENGLISH

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Typeset by Datagrafix, Inc. Printed in Great Britain by Clays Ltd, St Ives plc homosexual /həʊməˈsekʃuəl/ adj شَاذُ جِنْسِيًا

honest /ˈɒnɪst/ adj صدفق honesty /ˈɒnəsti/ n صدفق honey /ˈhʌni/ n عَسلُ honour /ˈɒnə(r)/ n US -nor شُرَف • v (an agreement) يُنَفُّذ (the dead) يُشَرِّف

hood /hʊd/ n قَلْنُسُوَة hook /hʊk/ n خُطًّاف hop /hɒp/ v يَثْب hope /həʊp/ n أَمَال مَفْ/ج أَمَل/آمَال مَفْ/ج

H

hopeless /ˈhəʊpləs/ adj مُنِئُوس مِنْهُ horizon /həˈraɪzn/ n عَنْفُوس مِنْهُ horizon /həˈraɪzn/ n أَفُقَى المُفتِيّ horizontal /hɒrɪˈzɒntl/ adj قَرْن/قُرُون horn /hɔːn/ n (of a bull) مَفْرَ بُوق /أَبُواق مِفْرَج (in music) مِفْرِج (carˈs) مِفْرِج (carˈs)

horrible /ˈhɒrəbl/ adj (picture) كُرِيه (weather) فَظْيِع (murder, etc) مُرُوِّع (horrify /ˈhɒrɪfaɪ/ v يُرُوِّع horror /ˈhɒrə(r)/ n رُعْب horse /hɔːs/ n

مُسْن hospitality /hɒspɪˈtæləti/ n الضِيَافَة

host /həʊst/ n مُسْتَضِيف hostage /ˈhɒstɪʤ/ n رُهينَة/رَهَائِنُ مف/ج

hostile /ˈhɒstaɪl/ adj عَدَائِي hostility /hɒˈstɪləti/ n pl -ties /عَدَاء/ عَدَاءًات مف/ج

hot /hɒt/ adj (soup, day, pan)

السَاخِن، حَارٌ

a hot drink مَشْرُوب سَاخِن

I'm hot. أَشْعُر بِالحَرِّ

It's hot today.

hotel /həv'tel/ n جَافُنُدُقُ فَنَادِقُ مَفْ /ج hour /'avə(r)/ n سَاعَة /سَاعَات مِفْ /ج two hours later بَعْدُ سَاعَتْنِ in four hours كُلُ سَاعَات rour hours كُلُ سَاعَات twery hour كُلُ سَاعَة every hour كُلُ سَاعَة It will take an hour.

house /haʊs/ n مَنْزِل/مَنَازِلُ مَفْ/ج housing /ˈhaʊzɪŋ/ n إِسْكَان how /haʊ/ adʊ كَيْفَ كَيْفَ تَفْعَل ذَلِكَ؟ "How do you do it? How are you? (I'm) Fine! كَيْفَ حَالُكَ؟ أَنَا جُيدًا

كُنْفُ حَالُكُ؟ !How do you do!

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hbj\_althani لقائي اليوم مع Stephen Schwarzman chairman and CEO of Blackstone في منزلي في الدوحه

October 22, 2023 · See translation

